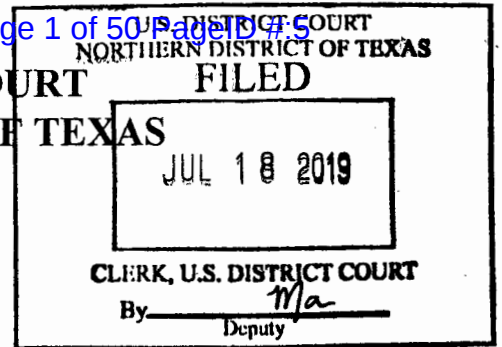


UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS



Sterling Conley Hurt  
Plaintiff

3-19CV-1722K

v.  
Ms. John Hurt Foundation  
Defendant

Civil Action No.

COMPLAINT

\* Attach additional pages as needed.

Date July 18, 2019  
Signature Sterling Conley Hurt  
Print Name Sterling Conley Hurt  
Address 5301 East McKinney Street Lot #348  
City, State, Zip Denton, TX 76208  
Telephone 940-395-1447

My name is Sterling Conley Hurt, I'm an heir to the Mississippi John Hurt Estate.

I want to file a civil suit against the Mississippi John Hurt Foundation. The address to the foundation is 520 Milton LN Hoffman estate, Chicago, Illinois 60169. The charge I want to file against the foundation is fraud, falsifying documents, and possibly money laundering. I believe this foundation is fraudulently operated to steal the estate from the rightful heirs by claiming the heirs are in agreement to make this estate a non-profit organization by the administrator of the foundation.

She fraudulently filed with the state of Illinois Office of the Secretary of State that I was one of the directors of the foundation. And that is an outright lie and a criminal offense. I'm submitting this document along with a copy of the court order we won for our grandfather's estate on May 17, 1999. The Mississippi John Hurt foundation was formed in the same year without the rest of the heirs consent.

I was also told by BMI Record Company that they released the escrow account to Mary Wright Hurt and her Attorney Linda S. Mensch in c/o American League Music as the publishing administrator of the estate. My grandmother entrusted Irene Smith, Harlow and Harlow Law firm. They won the estate for the family, the family had no reason to hire Mensch and we didn't hire her. Attorney Mensch has one client and her name is Mary Wright Hurt. I challenge Attorney Mensch to produce a contract of any other of the living heirs of the Mississippi John Hurt Estate.

I contacted Welk Music Group and informed BMI Records INC. and warned them about Attorney Mensch and Mary Wright Hurt. I sent proof that Attorney Mensch did not represent me in this matter by sending them a letter from the state bar where Attorney Mensch practice law. She had to admit she did not represent me in this matter. I'm sending a copy of said letter and communication with the record companies. All the record company's needed to do was ask Attorney Mensch if she had contracts with any of the living heirs to prove it as I did, and they would have if they wasn't working with her to defraud the family out of our estate.

I'm willing to swear under oath that what I'm saying is the truth so help me God. My brother and I have not received anything from our grandfather estate because we wanted to know how much money in escrow and accounting both foreign and domestic and was denied. We also believe that Mary Wright Hurt sold the masters to the record company without the rest of the heirs consent. If that's the case we want it back, I hope you can help us with this matter.

Sincerely,  
Sterling Conley Hurt

## IN THE CHANCERY COURT OF GRENADA COUNTY, MISSISSIPPI

IRENE SMITH, LONNIE CONLEY HURT, JESSE  
JOHNSON AND DOROTHY HURT JOHNSON

PETITIONERS

VERSUS

NO. 92-8-277

THOMAS HOSKINS, BILL NOWLIN & THE  
ROUNDER RECORD GROUPS, ULYSSES  
CONLEY HURT, STERLING CONLEY HURT,  
MARY FRANCES CONLEY HURT, MARY  
ANN CONLEY HURT, REBECCA CONLEY  
HURT, HENRY LEE CONLEY HURT, ANNIE  
CONLEY HURT, BOBBIE CONLEY HURT,  
GERTRUDE CONLEY HURT, ANNIE DORA  
CONLEY, HURT, CHRISTINE CONLEY HURT,  
WILLIE ED CONLEY HURT, T. C. CONLEY  
HURT, JR., AND R.C. CONLEY HURT

RESPONDENTS

ORDER TO DETERMINE RIGHTFUL HEIRS OF  
JOHN S. HURT, DECEASED

THIS DAY, THIS CAUSE came on to be heard and from the evidence  
and pleadings, the Court herewith enters its finding of facts and  
order as follows:

## FINDING OF FACT

The Court has jurisdiction over the subject matter and the  
parties, herein. Venue is proper in this Court and if there be any  
issue in that respect same has been waived as there has been no  
objection raised in that respect, and all interested and necessary  
parties are lawfully before the Court.

The Petitioners are adult resident citizens of the State of  
Mississippi.

John S. Hurt, while having a fixed place of residence in the  
County of Grenada, State of Mississippi, departed this life in

FILED May 17 1999  
POWELL VANCE/Chancery Clerk  
By Ivory McCain D.C.

Recorded In  
Minute Book 58A  
At No. 78

LAW OFFICES OF HARLOW & HARLOW, P.A.

VILLAGE CREEK PLAZA  
1360 SUNSET DRIVE, SUITE 3  
GRENADA, MISSISSIPPI 38901

A. E. (GENE) HARLOW, SR.  
A. E. (RUSTY) HARLOW, JR.

*Court Order*

(601) 226-7214  
FAX (601) 226-2932

LEGAL ASSISTANTS  
MYRON PROCTOR  
CHARLINE ALLDREAD

May 19, 1999

STERLING CONLEY HURT  
5301 East McKinney Street  
Lot #348  
Denton, TX 76208.

RE: Estate of John Hurt

Dear Sterling:


Please find the enclosed copy of the order filed on May 17, 1999 which determined the rightful heir of John Hurt.

I will be forwarding a copy of this order to all of the heirs so that everyone will be informed as to what has taken place in this matter.

If you have any questions regarding this matter, please feel free to contact my office.

Sincerely yours,

Harlow & Harlow, P. A.

  
A. E. (Rusty) Harlow, Jr.

AEHjr/mbg

enclosure

Grenada County, Mississippi, on or about the November 2, 1966, having no Last Will and Testament.

Petitioner has asserted, upon information and belief, that the rightful heirs of John S. Hurt, deceased, are his wife, Gertrude Conley Hurt, the heirs of his deceased daughter, Idella Hurt Johnson, who are Dorothy Miller and Jesse Johnson; and the heirs of his deceased son, T. C. Conley Hurt, which includes Petitioners Irene Smith, Willie Ed Conley Hurt, T. C. Conley Hurt, Jr., Lonnie Conley Hurt, Ulysses Conley Hurt, Sterling Conley Hurt, Mary Frances Conley Hurt Wright, Mary Ann Conley Hurt West, Rebecca Conley Hurt, Henry Lee Conley Hurt, Annie Conley Hurt White and Bobbie Conley Hurt Lawrence.

Petitioner has asserted, upon information and belief, that no person other than those named in the last preceding paragraph has right, title, or interest in or to the property to the decedent, nor are heirs at law of the decedent.

Petitioner has asserted, upon information and belief, that decedent left his sole heirs at law only those persons specifically named hereinabove, and that only those persons are entitled to enjoy benefit of, and receive, the estate of the decedent.

IT IS THEREFORE ordered, adjudged and decreed that:

1. The rightful heirs of John S. Hurt, deceased are his wife, Gertrude Conley Hurt, the heirs of his deceased daughter, Idella Hurt Johnson, who are Dorothy Miller and Jesse Johnson; and the heirs of his deceased son, T. C. Conley Hurt, which include

Petitioners Irene Smith, Willie Ed Conley Hurt, T. C. Conley Hurt, Jr., Lonnie Conley Hurt, Ulysses Conley Hurt, Sterling Conley Hurt, Mary Frances Conley Hurt Wright, Mary Ann Conley Hurt West, Rebecca Conley Hurt, Henry Lee Conley Hurt, Annie Conley Hurt White and Bobbie Conley Hurt Lawrence.

2. At the time John S. Hurt departed this life the above named heirs are his only true heirs-at-law.

3. Ruling Upon other relief is herewith deferred pending the further orders of this Court, and this cause is hereby continued until further orders of this Court.

ORDERED, ADJUDGED, and DECREED this the 17th day of ~~March~~<sup>May</sup>, 1999.

  
CHANCELLOR

Sterling Conley Hurt  
5301 E McKinney St #348  
Denton, TX 76208  
September 27, 2006

To Whom it May Concern:

My name is Sterling Conley Hurt and I am an heir to the Mississippi John Hurt Estate. I am writing on behalf of my brothers and sisters who are also heirs to the John hurt Estate. We are writing to inform this company that Linda Mensch DOES NOT have a contract of representation by any of the heirs that will be named at the end of this letter. Unless it was fraudulently obtained by Mary Francis Wright Hurt. Linda Mensch is Mary's attorney and has not been authorized to accept anything on our behalf. We were not involved in any decision-making or told anything about this estate or we would know what Mary and her attorney Linda Mensch know. By not keeping the rest of the heirs informed - is the work of thieves-not representation. We are here by requesting Welk Music Group not to pay Mary Francis Wright or attorney Mensch on our behalf. We will only accept payment directly from Welk Music Group. If this is not acceptable to your company, please write or call to inform us of your actions. You should know if this matter is not resolved we will sue Welk Music Group with no further notice. We can be reached at the numbers below. We are requesting Welk Music Group to provide us with copies of all payments paid through attorney Mensch or Mary Francis Wright Hurt. They have falsely represented us in this matter and they will be dealt with as well as Welk Music Group if the request for information on our Grandfather's estate is denied. We are more than capable of taking care of our financial affairs. We look forward to hearing from you on this matter. Again we can be reached at the numbers listed below:

Willie E. Conley Hurt	1-315-598-8630
T.C. Conley Hurt	1-317-923-4200
Sterling Conley Hurt	1-940-380-8862
Bobbie Lawrence Hurt	1-940-891-0456
Mary West Hurt	1-940-891-0456
Ulyesses Conley Hurt	1-601-506-4581
Henry Conley Hurt	1-817-633-6672
Annie Ledge Hurt	1-662-455-3148
Rebecca Omyeni Hurt	1-817-548-7529

Sincerely,

Sterling Conley Hurt

*Sterling Conley Hurt*

C/C

Sterling Conley Hurt  
5/16/07

BMI  
10 Music Square  
East Nashville, Tenn. 37203

Attention: Ms Patsy Bradley  
Re: Mississippi John Hurt royalty payments/publications

Dear Ms Bradley,

My name is Sterling Conley Hurt and I'm an heir to the Mississippi John Hurt Estate. I'm enclosing a copy of the court order and probate papers and a copy of my driver's license to prove who I am. My reason for writing your company is because it has been brought to my attention that there is an attorney claiming to represent the estate of Mississippi John Hurt and has gotten royalties on my behalf. This attorneys name is Linda Mensch. This lady was not authorized to represent me or collect any royalties on my behalf or anything else for that matter.

Therefore I'm requesting any and all information you have, both foreign and domestic, concerning royalty payments paid to the Mississippi John Hurt Estate, and any and all information, both foreign and domestic, concerning all publications about the Mississippi John Hurt Estate.

Thank you,

Mr. Sterling Conley Hurt

*Mr. Sterling Conley Hurt*

fax # 615-401-2707



Attention: Ms Patsy Bradley  
BMI Records  
10 Music Square East  
Nashville, TN 37203-4399

Mr. Sterling Conley Hurt  
5/29/07  
5301 East McKinney St.  
Lot 348  
Denton, TX 76208

Re: Mississippi John Hurt Royalty Payments

Dear Ms Bradley,

I'm an heir to the Mississippi John Hurt Estate. My name is Sterling Conley Hurt and I'm writing to inform this company that Linda Mensch or Mary Francis Wright Hurt is not authorized to represent me on this estate nor have I agreed to pay John William Hurt a part of my Grandfathers estate. They have not been authorized to except any royalties on my behalf. I have not received any royalty payment to this date. Therefore I'm requesting my part of the royalty payments to be paid directly to me on this estate. I'm sending a copy of the court orders and probate papers alone with this letter to prove who I am. I'm also requesting an accounting of all royalty payments paid to the Mississippi John Hurt account both foreign and domestic. There is also the matter of deceased siblings in this case who were alive at the time of this court case who Linda Mensch and Mary Francis Wright were not authorized to represent nor collect royalties on their behalf. These deceased siblings are Lonnie Conley Hurt, R.C. Conley Hurt, Irene Smith Hurt, Christine Conley Hurt and my mother Annie Dora Conley Hurt. Linda Mensch and Mary Francis Wright has no right to their part of the royalties unless Ms Mensch can show signed contracts of the deceased people named above in this letter. Nor should John William Hurt be paid a part of my Grandfathers estate. For only the people mentioned in the court order dated May 17, 1999 are the only true heirs at law. Thank you for your cooperation in advance.

Sincerely,

Mr. Sterling Conley Hurt

Mr. Sterling Conley Hurt  
SSN# 425-11-9522

Sterling Conley Hurt  
October 20, 2010

Welk Music Group  
2700 Pennsylvania Ave.  
Santa Monica, CA 90404  
Business Affairs-Maduke

RE: Mississippi John Hurt Royalty Payment

Dear Ms. Maduke,

I would like to remind you of the original court order that Attorney Mensch registered with the United States Copyright Office which states that, it is therefore ordered, adjudged and decreed that the rightful heirs of John S. Hurt, deceased are his wife, Gertrude Conley Hurt, the heirs of his deceased daughter, Idella Hurt Johnson, who are Dorothy Miller and Jesse Johnson and the heirs of his deceased son T. C. Conley Hurt, which include petitioners Irene Smith, Willie Eddie Conley Hurt, T. C. Conley Hurt Jr. , Lonnie Conley Hurt, Ulysses Conley Hurt, Sterling Conley Hurt, Mary Francis Conley Hurt Wright, Mary Ann Conley Hurt West, Rebecca Conley Hurt, Henry Lee Conley Hurt, Annie Conley Hurt White and Bobbie Conley Hurt Lawrence. At the time John S. Hurt departed this life the above named heirs are his only true heirs-at-law. Now my question to you and your employer is what about this original court order don't you understand? Your company has allowed Attorney Linda Mensch to bring you another court order from God knows where and you want us to accept your oversight. It is not going to happen Ms. Maduke. John William Hurt and Ms. Brown are not a part of this estate and your company will not force them upon us not without a fight. The money that you've paid these people out of this estate will be reimbursed. See you in court.

Truly Yours,

Mr. Sterling Conley Hurt

Sterling Conley Hurt  
10-6-2010

Attention: Patricia Maduke  
Welk Music Group

Dear Ms. Maduke,

After talking to you by phone on 10-5-10, I decided that I would go back to court and challenge your company's claims of owning the masters to this estate. I'm also going to challenge Suzanne H. Brown and John William Hurt rights to have any part of this estate. And since I can't get a proper accounting from your company, Jay Warner, the publishing administrator to this estate or Attorney Mensch I have no choice but to go through the courts to get this information that I'm entitled to have in order to determine the proper amount owed to me. As I told you, I would like to settle this matter out of court but I don't see anyway around it.

Thank you,

Mr. Sterling Conley Hurt

*Sterling Conley Hurt*

*C/c*

*welk music group*

Sterling Conley Hurt  
5/25/07

Attention: Ms Patsy Bradley  
BMI Records  
Nashville, TN 37203-4399

Re: Mississippi John Hurt Royalty Payments

Dear Ms Bradley,

I'm an heir to the Mississippi John Hurt Estate. My name is Sterling Conley Hurt and I'm writing to inform this company that Linda Mensch or Mary Francis Wright Hurt is not authorized to represent me on this estate nor have I agreed to pay John William Hurt a part of my Grandfathers estate. They have not been authorized to except any royalties on my behalf. I have not received any royalty payment to this date. Therefore I'm requesting my part of the royalty payments to be paid directly to me on this estate. I'm sending a copy of the court orders and probate papers alone with this letter to prove who I am. I'm also requesting an accounting of all royalty payments paid to the Mississippi John Hurt account both foreign and domestic. There is also the matter of deceased siblings in this case who were alive at the time of this court case who Linda Mensch and Mary Francis Wright were not authorized to represent nor collect royalties on their behalf. These deceased siblings are Lonnie Conley Hurt, R.C. Conley Hurt, Irene Smith Hurt, Christine Conley Hurt and my mother Annie Dora Conley Hurt. Linda Mensch and Mary Francis Wright has no right to their part of the royalties unless Ms Mensch can show signed contracts of the deceased people named above in this letter. Nor should John William Hurt be paid a part of my Grandfathers estate. For only the people mentioned in the court order dated May 17, 1999 are the only true heirs at law. Thank you for your cooperation in advance.

Sincerely,

Mr. Sterling Conley Hurt  
*Mr. Sterling Conley Hurt*

Mr. Willie Eddie Conley Hurt

5/29/07

513 Utica Street  
Fulton, New York

13069

Attention: Ms Patsy Bradley  
BMI Records  
10 Music Square East  
Nashville, TN 37203-4399

Re: Mississippi John Hurt Royalty Payments

Dear Ms Bradley,

I'm an heir to the Mississippi John Hurt Estate. My name is Willie Eddie Conley Hurt and I'm writing to inform this company that Linda Mensch or Mary Francis Wright Hurt is not authorized to represent me on this estate nor have I agreed to pay John William Hurt a part of my Grandfathers estate. They have not been authorized to except any royalties on my behalf. I have not received any royalty payment to this date. Therefore I'm requesting my part of the royalty payments to be paid directly to me on this estate. I'm sending a copy of the court orders and probate papers alone with this letter to prove who I am. I'm also requesting an accounting of all royalty payments paid to the Mississippi John Hurt account both foreign and domestic. There is also the matter of deceased siblings in this case who were alive at the time of this court case who Linda Mensch and Mary Francis Wright were not authorized to represent nor collect royalties on their behalf. These deceased siblings are Lonnie Conley Hurt, R.C. Conley Hurt, Irene Smith Hurt, Christine Conley Hurt and my mother Annie Dora Conley Hurt. Linda Mensch and Mary Francis Wright has no right to their part of the royalties unless Ms Mensch can show signed contracts of the deceased people named above in this letter. Nor should John William Hurt be paid a part of my Grandfathers estate. For only the people mentioned in the court order dated May 17, 1999 are the only true heirs at law. Thank you for your cooperation in advance.

Sincerely,

Mr. Willie Eddie Conley Hurt

Mr. Willie Eddie Conley Hurt  
SS# 587-01-7571



May 11, 2007

Estate of Gertrude Conley Hurt  
c/o Linda S. Mensch, P.C.  
200 S. Michigan Avenue, Suite 1240  
Chicago, IL 60604

Mr. John William Hurt  
c/o Patrick LeBlanc, Esq.  
4040 North State Street  
Jackson, MS 39206-5754

Mr. Sterling Conley Hurt  
5301 E. McKinney Street, Suite 348  
Denton, TX 76208

Mr. Willie Eddie Conley Hurt  
513 Utica Street  
Fulton, NY 13069

Re: Mississippi John Hurt Record Royalty Payments

Gentlepersons:

Given the conflicting information I have received from some of you (e.g., the number of the heirs of T.C. Conley Hurt provided by Linda Mensch conflicts with the number of heirs identified in the May 17, 1999 order of the Chancery Court of Grenada County) Welk Music Group, Inc. is unable to determine who the actual heirs are and how record royalties are to be divided. As such we will not make any further payment of record royalties to any heirs until we receive legally conclusive verification on behalf of all of the heirs as to who the heirs are, which heirs are entitled to receive payment and how such royalties are to be calculated and distributed. I suggest that all of the heirs of Mississippi John Hurt enter into a settlement agreement that: (a) provides the identity of the heirs and the portion of record royalties to which they are entitled; and (b) confirms which heirs are willing to have their royalties reduced to pay the portion of record royalties payable to John William Hurt pursuant to the June 30, 2006 settlement agreement. Until this has been resolved by and between all of the heirs, we can take no further action.





March 29, 2007

Estate of Gertrude Conley Hurt  
c/o Linda S. Mensch, P.C.  
200 S. Michigan Avenue, Suite 1240  
Chicago, IL 60604

Mr. John William Hurt  
c/o Patrick LeBlanc, Esq.  
4040 North State Street  
Jackson, MS 39206-5754

Mr. Sterling Conley Hurt  
5301 E. McKinney Street, Suite 348  
Denton, TX 76208

Re: Mississippi John Hurt Record Royalty Payments

Gentlepersons:

I am writing to advise you of a recent letter we received from Willie Eddie Conley Hurt who claims to be one of the heirs of Mississippi John Hurt. In his letter, Mr. Hurt claims that Linda Mensch was and is not authorized to represent him and/or collect royalties on his behalf.

Given the conflicting claims we have now received from various persons claiming to be heirs of the Estate of Mississippi John Hurt (including, but not limited to Willie Eddie Conley Hurt), we do not know which claimants should receive record royalties or what portions would be allocable to such claimants, if any. At present, the conflicting claims have raised the following questions: (i) who are all of the heirs of Mississippi John Hurt and what is their relationship to him (ii) which of the heirs are represented by Linda S. Mensch, P.C. and on what basis does such representation exist, (iii) which heirs are agreeable to having the royalties pooled and paid through the Estate of Gertrude Conley Hurt, and (iv) which heirs are agreeable to paying John William Hurt a portion of the royalties (whereby the share payable to such heirs would then be reduced by such amount). As such we will not make any further payment of record royalties to any heirs until we receive legally conclusive verification as to whom is entitled to receive payment and how such royalties are to be calculated and distributed.



As mentioned in my earlier correspondence, because of the number of heirs claiming a right to receive royalties payable on the Mississippi John Hurt account, the Welk Music Group, Inc. is acting, in effect, as a third party stakeholder and, as such, will hold each of the claimants responsible for any costs and/or legal fees we incur in connection with these claims whether as a result of an interpleader action or otherwise. Further, Welk reserves all of its rights and/or remedies hereunder.

Best regards.

A handwritten signature in dark ink, appearing to read "Patricia J. Maduke". The signature is fluid and cursive, with the first name "Patricia" being more legible than the last name "Maduke".

Patricia J. Maduke  
Business Affairs Coordinator

cc: Kevin Welk  
Carrie London  
Alma Vergara  
Willie Eddie Conley Hurt  
Stephen M. Baron, Esq.





March 29, 2007

Estate of Gertrude Conley Hurt  
c/o Linda S. Mensch, P.C.  
200 S. Michigan Avenue, Suite 1240  
Chicago, IL 60604

Mr. John William Hurt  
c/o Patrick LeBlanc, Esq.  
4040 North State Street  
Jackson, MS 39206-5754

Mr. Sterling Conley Hurt  
5301 E. McKinney Street, Suite 348  
Denton, TX 76208

Re: Mississippi John Hurt Record Royalty Payments

Gentlepersons:

I am writing to advise you of a recent letter we received from Willie Eddie Conley Hurt who claims to be one of the heirs of Mississippi John Hurt. In his letter, Mr. Hurt claims that Linda Mensch was and is not authorized to represent him and/or collect royalties on his behalf.

Given the conflicting claims we have now received from various persons claiming to be heirs of the Estate of Mississippi John Hurt (including, but not limited to Willie Eddie Conley Hurt), we do not know which claimants should receive record royalties or what portions would be allocable to such claimants, if any. At present, the conflicting claims have raised the following questions: (i) who are all of the heirs of Mississippi John Hurt and what is their relationship to him (ii) which of the heirs are represented by Linda S. Mensch, P.C. and on what basis does such representation exist, (iii) which heirs are agreeable to having the royalties pooled and paid through the Estate of Gertrude Conley Hurt, and (iv) which heirs are agreeable to paying John William Hurt a portion of the royalties (whereby the share payable to such heirs would then be reduced by such amount). As such we will not make any further payment of record royalties to any heirs until we receive legally conclusive verification as to whom is entitled to receive payment and how such royalties are to be calculated and distributed.



As mentioned in my earlier correspondence, because of the number of heirs claiming a right to receive royalties payable on the Mississippi John Hurt account, the Welk Music Group, Inc. is acting, in effect, as a third party stakeholder and, as such, will hold each of the claimants responsible for any costs and/or legal fees we incur in connection with these claims whether as a result of an interpleader action or otherwise. Further, Welk reserves all of its rights and/or remedies hereunder.

Best regards.

A handwritten signature in dark ink, appearing to read "Patricia J. Maduke". The signature is fluid and cursive, with the first name "Patricia" and last name "Maduke" clearly distinguishable.

Patricia J. Maduke  
Business Affairs Coordinator

cc: Kevin Welk  
Carrie London  
Alma Vergara  
Willie Eddie Conley Hurt  
Stephen M. Baron, Esq.



January 23, 2007

Mr. Sterling Conley Hurt  
5301 E. McKinney Street, Suite 348  
Denton, TX 76208

Re: Mississippi John Hurt Record Royalty Payments

Dear Mr. Hurt:

I am writing in response to the documents I have received from you regarding the above-referenced matter. In your documents, you claim that Linda Mensch does not represent you regarding the Estate of Mississippi John Hurt. I would like some clarification regarding this matter. Is it your position that Ms. Mensch has never represented you in any matter pertaining to the Estate of Mississippi John Hurt at any time? Also, it was my understanding that the heirs of Mississippi John Hurt had agreed that John William Hurt would receive 8.35% of the record royalties payable to the Mississippi John Hurt account. I wanted to verify that you are in agreement with John William Hurt receiving 8.35% of the record royalties. Is this the case?

As mentioned in my earlier correspondence with you, because of the number of heirs claiming a right to receive royalties payable on the Mississippi John Hurt account, the Welk Music Group, Inc. is acting, in effect, as a third party stakeholder and, as such, will hold each of the claimants responsible for any costs and/or legal fees we incur in connection with these claims whether as a result of an interpleader action or otherwise. Further, Welk reserves any rights or remedies it may have against any person claiming royalties.

I look forward to hearing from you in the near future.

Best regards.

A handwritten signature in black ink, appearing to read 'Patricia J. Maduke'.

Patricia J. Maduke  
Business Affairs Coordinator

cc: Kevin Welk  
Carrie London  
Alma Vergara  
Stephen M. Baron, Esq.





May 11, 2007

Estate of Gertrude Conley Hurt  
c/o Linda S. Mensch, P.C.  
200 S. Michigan Avenue, Suite 1240  
Chicago, IL 60604

Mr. John William Hurt  
c/o Patrick LeBlanc, Esq.  
4040 North State Street  
Jackson, MS 39206-5754

Mr. Sterling Conley Hurt  
5301 E. McKinney Street, Suite 348  
Denton, TX 76208

Mr. Willie Eddie Conley Hurt  
513 Utica Street  
Fulton, NY 13069

Re: Mississippi John Hurt Record Royalty Payments

Gentlepersons:

Given the conflicting information I have received from some of you (e.g., the number of the heirs of T.C. Conley Hurt provided by Linda Mensch conflicts with the number of heirs identified in the May 17, 1999 order of the Chancery Court of Grenada County) Welk Music Group, Inc. is unable to determine who the actual heirs are and how record royalties are to be divided. As such we will not make any further payment of record royalties to any heirs until we receive legally conclusive verification on behalf of all of the heirs as to who the heirs are, which heirs are entitled to receive payment and how such royalties are to be calculated and distributed. I suggest that all of the heirs of Mississippi John Hurt enter into a settlement agreement that: (a) provides the identity of the heirs and the portion of record royalties to which they are entitled; and (b) confirms which heirs are willing to have their royalties reduced to pay the portion of record royalties payable to John William Hurt pursuant to the June 30, 2006 settlement agreement. Until this has been resolved by and between all of the heirs, we can take no further action.



As mentioned in my earlier correspondence, because of the number of heirs claiming a right to receive royalties payable on the Mississippi John Hurt account, the Welk Music Group, Inc. is acting, in effect, as a third party stakeholder and, as such, will hold each of the claimants responsible for any costs and/or legal fees we incur in connection with these claims whether as a result of an interpleader action or otherwise. Further, Welk reserves all of its rights and/or remedies hereunder.

Best regards.

A handwritten signature in black ink, appearing to read "Patricia J. Maduke". The signature is fluid and cursive, with the first name "Patricia" being more prominent than the last name "Maduke".

Patricia J. Maduke  
Business Affairs Coordinator

cc: Kevin Welk  
Carrie London  
Alma Vergara  
Stephen M. Baron, Esq.



October 23, 2006

Mr. Sterling Conley Hurt  
5301 E. McKinney Street, Suite 348  
Denton, TX 76208

Re: Mississippi John Hurt Royalty Payments

Dear Mr. Hurt:

I am writing in response to your letter dated September 27, 2006 that was received by our office on October 12, 2006 wherein you informed us that Linda Mensch does not have the authority to represent nine of the heirs of the Estate of Mississippi John Hurt and wherein you requested copies of payments made to Linda Mensch and Mary Francis Wright Hurt. In response to your letter, we are contacting Linda Mensch and John William Hurt's representative to advise them that statements and payments will be withheld until this claim is resolved.

Please be advised that we will be unable to provide you (or any other persons you claim to represent) copies of any payments or any other such information made to Linda Mensch and Mary Francis Wright Hurt until we are provided with adequate documentation verifying that you (and the other people listed in your letter) are a rightful heir of Mississippi John Hurt and are entitled to receive records of any such payments.

In the meantime, please be advised that because of the number of heirs claiming a right to receive royalties payable on the Mississippi John Hurt account, the Welk Music Group, Inc. is acting, in effect, as a third party stakeholder and, as such, will hold each of the claimants responsible for any costs and/or legal fees we incur in connection with these claims whether as a result of an interpleader action or otherwise. Further, Welk reserves any rights or remedies it may have against any person claiming royalties.

If you have any questions regarding this correspondence, please telephone me at (310) 829-9355, Ext. 159.

Best regards.

A handwritten signature in cursive script, appearing to read "Patricia J. Maduke".

Patricia J. Maduke  
Business Affairs Coordinator

cc: Kevin Welk  
Carrie London  
Alma Vergara  
Stephen M. Baron, Esq.





October 13, 2010

Mr. Sterling Conley Hurt  
5301 E. McKinney Street, Suite 348  
Denton, TX 76208

Re: Mississippi John Hurt Royalty Payments

Dear Mr. Hurt:

I am writing in response to your letter that I received via facsimile on October 6, 2010. In a conversation we had before you sent the letter, you indicated that you would be faxing documents to me that included a signed statement by Linda Mensch that she did not represent you or Willie Eddie Conley Hurt as well as documents from the Copyright Office regarding Vanguard Records ownership of certain copyrights that you dispute. The documents you forwarded included neither.

In your letter you also incorrectly state that Welk Music Group, Inc. ("Welk") is refusing to provide you with a "proper accounting." In our conversation you asked how much we paid the Estate of Gertrude Conley Hurt. I told you that we could not provide you with the information and you would need to contact the Estate directly. Our obligation to provide payments and statement regarding royalties due the Estate (for the share of record royalties that would have been payable to Gertrude Conley Hurt if she were still living) are to the legal representative of the Estate. We have no obligation to provide such information to you or any other any third party. If you believe you are entitled to any portion of the monies paid to the Estate of Gertrude Conley Hurt for such share, you would need to contact the Estate directly.

As I mentioned to you, we will not make any payment of record royalties to any heirs of T.C. Conley Hurt until we receive legally conclusive verification on behalf of all of such heirs as to how such royalties are to be calculated and distributed amongst all of the heirs. Please provide such documentation so that we may make payment.

As mentioned in previous correspondence, because of the number of heirs claiming a right to receive royalties payable on the Mississippi John Hurt account, the Welk Music Group, Inc. is acting, in effect, as a third party stakeholder and, as such, will hold each of the claimants responsible for any costs and/or legal fees we incur in connection with these claims whether as a



Vendor No: ESTGER / Name: ESTATE OF GERTRUDE CONLEY HURT

83518

Invoice	Ref	Inv Date	Inv Amt	Discount	Adj Amt	Amt Paid
1H99-731	1H99 SEMI	08/10/06	1415.25	0.00	0.00	1415.25
2H05-731	2H05 SEMI	08/10/06	18543.66	0.00	0.00	18543.66
2H98-731	2H98 SEMI	08/10/06	822.21	0.00	0.00	822.21

(Acct: 1001-001-100-0000)

Check Date 08/24/06

Total

20781.12

8351



**WELK MUSIC GROUP**  
 310.829.WELK  
 2700 PENNSYLVANIA AVENUE  
 SANTA MONICA, CA 90404

WELLS FARGO BANK, N.A.  
 WWW.WELLSFARGO.COM

11-24/1210

\*\*\*Twenty Thousand Seven Hundred Eighty-One &amp; 12/100 Dollars

DATE

AMOUNT

PAY  
 TO THE  
 ORDER  
 OF

ESTATE OF GERTRUDE CONLEY HURT  
 O/B/O MISS JOHN HURT MUSIC INC  
 520 MILTON LANE  
 HOFFMAN ESTATES, IL 60194 USA

08/24/06

\$20781.12

*[Handwritten Signature]*  
 AUTHORIZED SIGNATURE

⑈083518⑈ ⑆121000248⑆4757021241⑈

WELK MUSIC GROUP 2700 PENNSYLVANIA AVENUE SANTA MONICA, CA 90404

8351

Vendor No: ESTGER / Name: ESTATE OF GERTRUDE CONLEY HURT

83518

Invoice	Ref	Inv Date	Inv Amt	Discount	Adj Amt	Amt Paid
1H99-731	1H99 SEMI	08/10/06	1415.25	0.00	0.00	1415.25
2H05-731	2H05 SEMI	08/10/06	18543.66	0.00	0.00	18543.66
2H98-731	2H98 SEMI	08/10/06	822.21	0.00	0.00	822.21

(Acct: 1001-001-100-0000)

Check Date 08/24/06

Total

20781.12



Sterling Conley Hurt  
9/30/2010

Attention: Mr. Wilfried Jaeger  
BMI Record Co.  
7 World Trade Center  
250 Greenwich Street  
New York, New York

Dear Mr. Jaeger,

My name is Sterling Conley Hurt and my reason for writing stems from a letter I received from your company dated June 20, 2007. I am enclosing a copy of said letter along with a complaint that was filed against Attorney Linda Mensch and her response to my complaint. Her co-counsel Attorney J. Lane Greenlee claimed that Attorney Mensch had an employment agreement with me which was not true and that was the basis of my complaint with the bar. I'm also enclosing a copy of that letter from Attorney Greenlee dated February 6, 2002. I am not faulting your company for this because I can see your company was misled by these attorneys. However in your letter you stated BMI is paying the estate of Gertrude Hurt c/o American League Music as its agent. And since I have not received any royalties from this estate, I am requesting to be paid my share of the estate directly from your company. I am also requesting an accounting of all royalties paid to American League Music on my behalf. My hope is that this matter can be resolved without going to court. I would like to avoid going to court if I can because all I want is my share of the estate. I can be reached at 940-380-8862 (home) and 940-395-1447 (cell).

My address is: 5301 East McKinney Street Lot#348  
Denton, TX 76208

Thank you,

Mr. Sterling Conley Hurt



Linda S. Mensch  
Direct: 312-602-5049  
Fax: 312-698-7449  
linda.mensch@bryancave.com  
menschlaw@gmail.com

August 24, 2010

Myrrha B. Guzman  
Senior Counsel  
Attorney Registration & Disciplinary  
Commission  
One Prudential Plaza  
130 East Randolph Drive  
Suite 1500  
Chicago, IL 60601

Re: Linda S. Mensch in relation to Sterling Conley;  
No. 2010n03344

Dear Attorney Guzman:

This is in response to the aforementioned communication. The allegations are denied.

On September 16, 1997, I was retained by Mr. Conley's grandmother, Gertrude Conley Hurt, and Mr. Conley's sister, Mary Hurt Wright, who were determined to right what they believed to be a grave wrong—the loss of their family legacy. Mary Wright is the granddaughter of Mississippi John Hurt and Gertrude Conley Hurt. Mary Wright is also the Executrix of the Last Will And Testament of Gertrude Conley Hurt, and the guiding force in restoring the family legacy.

I have included for your records the Retainer Agreement that was signed by Gertrude Conley Hurt, Mary Hurt Wright, and various individuals who I believe to be Gertrude's grandchildren. The Agreement entitles my firm, Linda S Mensch PC, to a fee of 1/3 of the monies recovered, as well as costs and expenses.

Mr. Conley was not a client of the firm, and did not retain us.

I have spent close to 13 years working with Mrs. Wright to recover the assets -- the copyrights in the Estate of Mississippi John Hurt. The case was time consuming and confusing. We were fortunate to have found counsel in Mississippi who also undertook these matters at vastly reduced fees.

RECEIVED

AUG 25 2010

ATTY. REG. & DISC. COMM.  
CHICAGO

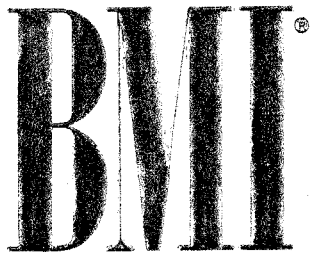
**Bryan Cave LLP**  
161 North Clark Street  
Suite 4300  
Chicago, IL 60601-3315  
Tel (312) 602-5000  
Fax (312) 602-5050  
www.bryancave.com

**Bryan Cave Offices**  
Atlanta  
Charlotte  
Chicago  
Dallas  
Hamburg  
Hong Kong  
Irvine  
Jefferson City  
Kansas City  
London  
Los Angeles  
Milan  
New York  
Paris  
Phoenix  
San Francisco  
Shanghai  
St. Louis  
Washington, DC

**Bryan Cave International Trade**  
A TRADE CONSULTING SUBSIDIARY  
OF NON-LAWYER PROFESSIONALS

www.bryancavetrade.com  
Bangkok  
Beijing  
Jakarta  
Kuala Lumpur  
Manila  
Shanghai  
Singapore  
Tokyo

**Bryan Cave Strategies**  
A GOVERNMENT RELATIONS AND  
POLITICAL AFFAIRS SUBSIDIARY  
www.bryancavestrategies.com  
Washington, DC  
St. Louis



June 20, 2007

**Wilfried Jaeger**  
Paralegal  
Legal & Business Affairs  
Performing Rights

Sterling C. Hurt  
5301 East McKinney Street, Lot 348  
Denton, TX 76208

RE: Estate of Mississippi John Hurt

Dear Mr. Hurt:

Your letter (and that of Willie) has been forwarded to me.

Please note that the substitution agreement that was entered into was pursuant to a Court issued document (enclosed for your reference) indicating that Mary Frances Conley Hurt Wright was appointed as Executrix of the Estate of Gertrude Hurt. As such, BMI is obligated by Court direction to pay any royalties which may be due or become due on behalf of the works of Mr. Hurt and which would have been payable to Mrs. Hurt, now to her Estate.

As an heir and legatee of Mrs. Hurt under her Last Will and Testament, your rights are contingent upon the estate of Mrs. Hurt closing and only at such time can we pay you directly. Therefore, inasmuch as BMI is paying the Estate of Gertrude Hurt c/o American League Music as its agent, it shall be necessary for you and Willie to contact either the Estate of Mrs. Hurt or American League Music.

Should you have any additional questions, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Wilfried Jaeger', with a long, sweeping horizontal line extending to the right.

Wilfried Jaeger

cc: Willie E. C. Hurt  
Estate of Gertrude Hurt  
American League Music  
Linda Mensch, Esq.





June 20, 2007

**Wilfried Jaeger**  
Paralegal  
Legal & Business Affairs  
Performing Rights

Sterling C. Hurt  
5301 East McKinney Street, Lot 348  
Denton, TX 76208

RE: Estate of Mississippi John Hurt

Dear Mr. Hurt:

Your letter (and that of Willie) has been forwarded to me.

Please note that the substitution agreement that was entered into was pursuant to a Court issued document (enclosed for your reference) indicating that Mary Frances Conley Hurt Wright was appointed as Executrix of the Estate of Gertrude Hurt. As such, BMI is obligated by Court direction to pay any royalties which may be due or become due on behalf of the works of Mr. Hurt and which would have been payable to Mrs. Hurt, now to her Estate.

As an heir and legatee of Mrs. Hurt under her Last Will and Testament, your rights are contingent upon the estate of Mrs. Hurt closing and only at such time can we pay you directly. Therefore, inasmuch as BMI is paying the Estate of Gertrude Hurt c/o American League Music as its agent, it shall be necessary for you and Willie to contact either the Estate of Mrs. Hurt or American League Music.

Should you have any additional questions, please feel free to contact me.

Very truly yours,

Wilfried Jaeger

cc: Willie E. C. Hurt  
Estate of Gertrude Hurt  
American League Music  
Linda Mensch, Esq.



File Number 6138-438-3

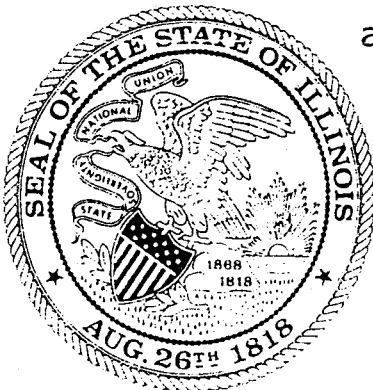
Falsified Documents

State of Illinois  
Office of  
The Secretary of State

Whereas, ARTICLES OF INCORPORATION OF  
MISSISSIPPI JOHN HURT BLUES FOUNDATION  
INCORPORATED UNDER THE LAWS OF THE STATE OF ILLINOIS HAVE BEEN  
FILED IN THE OFFICE OF THE SECRETARY OF STATE AS PROVIDED BY THE  
GENERAL NOT FOR PROFIT CORPORATION ACT OF ILLINOIS, IN FORCE  
JANUARY 1, A.D. 1987.

Now Therefore, I, Jesse White, Secretary of State of the State of Illinois, by virtue of the powers vested in me by law, do hereby issue this certificate and attach hereto a copy of the Application of the aforesaid corporation.

In Testimony Whereof, I hereto set my hand and cause to be affixed the Great Seal of the State of Illinois, at the City of Springfield, this 21ST day of DECEMBER A.D. 2000 and of the Independence of the United States the two hundred and 25TH



Jesse White

Secretary of State

(Rev. Jan. 1995)

**FILED**

DEC 21 1

**SUBMIT IN DUPLICATE**

Date 12-1-00

Payment must be made by Certified Check, Cashier's Check, Illinois Attorney's Check, Illinois C.P.A.'s Check or Money Order, payable to "Secretary of State."

Filing Fee \$50

Approved Be**DO NOT SEND CASH!**

JESSE WHITE  
SECRETARY OF STATE

TO: Secretary of State

Pursuant to the provisions of "The General Not For Profit Corporation Act of 1986," the undersigned incorporator(s) hereby adopt the following Articles of Incorporation.

Article 1. The name of the corporation is: Mississippi John Hurt Blues Foundation

Article 2. The name and address of the initial registered agent and registered office are:

Registered Agent Jay B ROSS  
First Name Middle Name Last Name  
Registered Office -8-38 W Grand Ave-  
Number Street (Do Not Use P.O. Box)  
Chicago IL 60622 COOK  
City Zip Code County

Article 3. The first Board of Directors shall be 3 in number, their names and residential addresses be as follows: (Not less than three)

Director's Names	Number	Street	Address City	State
Mary F Hurt-Wright		520 Milton Lane	Hoffman Estates	IL 60144
Sterling Conley		5301 East McKinney St	Denton, TX	76208
Jennifer A. Wright		520 Milton Lane	Hoffman Estates	IL 60144

Article 4. The purposes for which the corporation is organized are:

Educational Activities

Is this corporation a Condominium Association as established under the Condominium Property Act?

☐ Yes ☒ No (Check one)

Is this corporation a Cooperative Housing Corporation as defined in Section 216 of the Internal Revenue Code of 1954? ☐ Yes ☒ No (Check one)

Is this a Homeowner's Association which administers a common-interest community as defined in subsection (c) of Section 9-102 of the Code of Civil Procedure? ☐ Yes ☒ No

Article 5. Other provisions (please use separate page):



## OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

DECEMBER 21, 2000

6138-438-3

JAY B ROSS  
838 W GRAND AVE  
CHICAGO, ILLINOIS 60622-0000

RE MISSISSIPPI JOHN HURT BLUES FOUNDATION

DEAR SIR OR MADAM:

ENCLOSED YOU WILL FIND THE CERTIFICATE OF INCORPORATION OF THE ABOVE NAMED CORPORATION. THE CORPORATION IS REQUIRED TO FILE AN ANNUAL REPORT EACH YEAR. BLANK FORMS WILL BE MAILED BY THIS OFFICE TO THE REGISTERED AGENT AS SHOWN BY OUR FILES APPROXIMATELY 60 DAYS PRIOR TO ITS ANNIVERSARY MONTH. (ORIGINAL DATE OF INCORPORATION).

THE REQUIRED FEE OF \$50.00 IN THIS CONNECTION HAS BEEN RECEIVED AND PLACED TO YOUR CREDIT.

THE CERTIFICATE MUST BE RECORDED IN THE OFFICE OF THE RECORDER OF THE COUNTY IN WHICH THE REGISTERED OFFICE OF THE CORPORATION IS LOCATED. FOR FURTHER INFORMATION CONTACT YOUR RECORDER OF DEEDS.

CERTAIN NOT FOR PROFIT CORPORATIONS ORGANIZED AS A CHARITABLE CORPORATION ARE REQUIRED TO REGISTER WITH THE OFFICE OF THE ATTORNEY GENERAL. UPON RECEIPT OF THE ENCLOSED ARTICLES OF INCORPORATION, YOU MUST CONTACT THE CHARITABLE TRUST DIVISION, OFFICE OF THE ATTORNEY GENERAL, 100 W. RANDOLPH, 3RD FLOOR, CHICAGO, ILLINOIS 60601 TELEPHONE (312) 814-2595.

SINCERELY,

JESSE WHITE  
SECRETARY OF STATE

DEPARTMENT OF BUSINESS SERVICES  
CORPORATION DIVISION  
TELEPHONE (217) 782-6961

JW:CD



LINDA S MENSCH PC  
200 S MICHIGAN AVE.  
SUITE #1240  
CHICAGO, IL 60604  
Tel: 312 922 2910  
Fax: 312 922 1865

FAX  
662-459-  
9115

TO: THE GRANDCHILDREN AND HEIRS OF MISSISSIPPI JOHN HURT AND  
GERTRUDE CONLEY HURT:

FROM: MARY WRIGHT

Sterling Conley Hurt, Dorothy M. Miller, Jesse L Johnson, Annie C. White Ledger, Mary  
Conley Hurt West, Willie Eddie Conley, R.C. Conley's Estate, Bobbie Hurt Lawrence,  
Henry Hurt Conley, Rebecca Hurt Conley, Ulysses Conley, Mary F. Conley Wright,  
Irene Conley Smith's Estate, T.C. Conley Jr., Lonnie Conley's Estate

Dear Grandchildren and Heirs of Mississippi John Hurt and Gertrude Conley Hurt:

I am pleased and delighted to advise you that we finally have a royalty distribution.

Mary is in my office with the first check from Vanguard. The check will go into your  
grandmother's estate account, and the funds will be distributed equally among all of the  
grandchildren. Since RC has no children, his share will be distributed among you equally.  
Also, we are aware that Dorothy Miller has received from Dick Waterman the sum of  
\$1000 which she owes the Estate. This amount will be deducted from any future  
distributions to her and applied to Estate expenses.

Pursuant to my Retainer Agreement with your grandmother and you of Sept. 17, 1997,  
my attorney's fees are 33 1/3% of the gross monies received from all sources.

The first check from Vanguard Music/ Welk Music Group  
will be paid as follows:

	20,781.12
Attorneys fees to LSM PC	- 6927.04
Corp filing fee for Publishing company	-250
BMI registration fee for Publishing co.	-250
Mailing expenses for Mary Wright:	no charge
Copying expenses LSM PC	no charge
=	13,354.08
Amount per Grandchild-heir:	890.27

(INCLUDES THE ESTATE OF RC CONLEY)

Please note that this check represents about 10 years worth of royalties, so do not get  
your hopes up about past monies. We hope that there will be activity in the future on your  
grandfather's wonderful catalog that will allow you to benefit.

Best wishes,

Linda Mensch



of page

COPY

J. LANE GREENLEE  
ATTORNEY AT LAW  
POST OFFICE BOX 430  
WINONA, MISSISSIPPI 38967  
662-283-1354

Cent # 7009 2830 0003 8600 5484

FACSIMILE: 662-283-4805  
E-MAIL: JLG@abanet.org  
LEGAL SECRETARY:  
MRS. ELIZABETH ELDRIDGE

February 6, 2002

PHYSICAL ADDRESS:  
401 SUMMIT ST., SUITE 103  
WINONA, MS 38967

Honorable Charles McDonnell Radigan  
Radigan and Garnett  
2009 N. 14th St., Suite 408  
Arlington, VA 22201-0569

RE: Smith v. Hoskins

Dear Mr. Radigan:

Please find enclosed a copy of the Order to Determine Rightful Heirs of John S. Hurt, Deceased, which was entered by the Chancery Court of Grenada County, Mississippi in Case No. 92-8-277 on May 17, 1999.

The Order provides that the rightful heirs of John S. Hurt were the following persons:

1. Gertrude Conley Hurt, his wife
2. Dorothy Miller
3. Jessie Johnson
4. Irene Smith
5. Willie Ed Conley Hurt
6. T. C. Conley Hurt, Jr.
7. Lonnie Conley Hurt
8. Ulysses Conley Hurt
9. Sterling Conley Hurt
10. Mary Frances Conley Hurt Wright
11. Mary Ann Conley Hurt West
12. Rebecca Conley Hurt
13. Henry Lee Conley Hurt
14. Annie Conley Hurt White
15. Bobbie Conley Hurt Lawrence

Although the Order does not so provide under the rules of descent and distribution of the State of Mississippi, the percentages of ownership would be as follows:

1. Gertrude Conley Hurt,  $\frac{1}{3}$  or 12/36
2. Dorothy Miller,  $\frac{1}{6}$  or 6/36

Page 2

J. LANE GREENLEE  
FEBRUARY 6, 2002  
PAGE 2

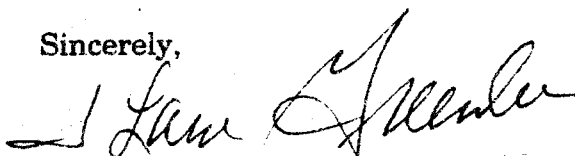
3. Jessie Johnson, 1/6 or 6/36
4. Irene Smith, 1/36
5. Willie Ed Conley Hurt, 1/36
6. T. C. Conley Hurt, Jr., 1/36
7. Lonnie Conley Hurt, 1/36
8. Ulysses Conley Hurt, 1/36
9. Sterling Conley Hurt, 1/36
10. Mary Frances Conley Hurt Wright, 1/36
11. Mary Ann Conley Hurt West, 1/36
12. Rebecca Conley Hurt, 1/36
13. Henry Lee Conley Hurt, 1/36
14. Annie Conley Hurt White, 1/36
15. Bobbie Conley Hurt Lawrence, 1/36

My co-counsel in this case, Linda S. Mensch, has an employment agreement with all of those owners dated September 16, 1997. A copy of that is enclosed for your file.

→ Are ? ?  
In order to simplify your bookkeeping, I suggest that you mail all royalties due to John S. Hurt to Linda S. Mensch, Esquire, in trust for the heirs and allow her to distribute those royalties according to the interest of the parties. Her address is shown on her letterhead.

If you need any further information, please let me know.

Sincerely,



J. Lane Greenlee

JLG/ee

Enclosure

c: Honorable Linda S. Mensch, 200 S. Michigan Ave., Suite 1240, Chicago, IL 60604  
Heirs of John S. Hurt

Tax records and  
 Checks paid to  
 Mary Wright Hunt

<input type="checkbox"/> CORRECTED (if checked)		OMB No. 1545-0115 <b>2006</b> Form 1099-MISC		<b>Miscellaneous Income</b>	
PAYER'S name, street address, city, state, ZIP code, and telephone no. 310/829-9355 WELK MUSIC GROUP, INC. C/O THE WELK GROUP, INC. 2700 PENNSYLVANIA AVENUE SANTA MONICA, CA 90404 USA		1 Rents \$ 2 Royalties 20781.12 3 Other income \$ 4 Federal income tax withheld \$		Copy B For Recipient	
PAYER'S federal identification number 72-1613181		5 Fishing boat proceeds \$ 6 Medical and health care payments \$ 7 Nonemployee compensation \$ 8 Substitute payments in lieu of dividends or interest \$ 9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/> \$ 10 Crop insurance proceeds \$ 11 \$ 12 \$		This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.	
RECIPIENT'S identification number 201003621		13 Excess golden parachute payments \$ 14 Gross proceeds paid to an attorney \$ 15a Section 409A deferrals \$ 15b Section 409A income \$ 16 State tax withheld \$ 17 State/Payer's state no. \$ 18 State income \$		19 \$	
RECIPIENT'S name, address, and ZIP code ESTATE OF GERTRUDE CONLEY HURT O/B/O MISS JOHN HURT MUSIC INC 520 MILTON LANE HOFFMAN ESTATES, IL 60194		Account number (see instructions) ESTGER		Department of the Treasury - Internal Revenue Service	
Form 1099-MISC		Printed on Recycled Paper		(keep for your records)	

ESTGER Ref Nbr	ESTATE OF GERTRUDE CONLEY HURT Invoice Nbr	Rounder Records Invoice Date	Amount Paid	Disc Taken	Net Check Amt
110194	ART ROY PE0607	06/30/07	124.52	0.00	124.52

file # 2553413

WELK MUSIC GROUP 2700 PENNSYLVANIA AVENUE SANTA MONICA, CA 90404

Invoice No: ESTGER / Name: ESTATE OF GERTRUDE CONLEY HURT

835

Invoice	Ref	Inv Date	Inv Amt	Discount	Adj Amt	Total
1899-001	1899 SENT	08/10/06	1415.25	0.00	0.00	1415.25
2600-001	2600 SENT	08/10/06	18543.66	0.00	0.00	18543.66
2000-001	2000 SENT	08/10/06	822.21	0.00	0.00	822.21

(0001: 1001-001-100-0000)

Check Date 08/24/06

Total

20781.12



**WELK MUSIC GROUP**  
310 829 WELK  
2700 PENNSYLVANIA AVENUE  
SANTA MONICA, CA 90404

WELLS FARGO BANK, N.A.  
WWW.WELLSFARGO.COM

11-24/1210

8351

Twenty Thousand Seven Hundred Eighty-One &amp; 12/100 Dollars

DATE

AMOUNT

PAY  
TO THE  
ORDER  
OF

ESTATE OF GERTRUDE CONLEY HURT  
O/R/O MISS JOHN HURT MUSIC INC  
520 MILTON LANE  
ROFFMAN ESTATES, IL 60194 USA

08/24/06

820781.12

*[Signature]*  
\_\_\_\_\_  
AUTHORIZED SIGNATURE

⑈083518⑈ ⑈121000248⑈4757021241⑈

		Sub Total:	\$0.25	\$42,757.33
79220-2 - TODAY				
CANADA	MIDLINE CD	7	0.1630	\$1.13
DOMESTIC	MIDLINE CD	251	0.3260	\$81.78
FOREIGN	MIDLINE CD	14	0.1630	\$2.33
		Sub Total:	\$85.24	\$42,842.57
79248-2 - IMMORTAL MISSISSIPPI JOHN HURT				
CANADA	MIDLINE CD	16	0.1630	\$2.59
DOMESTIC	MIDLINE CD	111	0.3260	\$36.20
FOREIGN	MIDLINE CD	6	0.1630	\$0.98
		Sub Total:		
79327-2 - LAST SESSIONS				
CANADA	MIDLINE CD	9	0.1630	
DOMESTIC	MIDLINE - MD	3	0.1630	
DOMESTIC	MIDLINE CD	125	0.00	
FOREIGN	MIDLINE CD	12	0.00	
		Sub Total:		
79505-2 - EARLY SOUL GOSPEL				
DOMESTIC	MIDLINE CD	4	0.046	
		Sub Total:		
79519-2 - REDISCOVERED/MISSISSIPPI JOHN HURT				
CANADA	FRONTLINE CD	8	0.1680	
DOMESTIC	FRONTLINE	2	0.1680	
DOMESTIC	FRONTLINE CD	820	0.3760	
FOREIGN	FRONTLINE CD	9	0.1680	

PAYER'S name, street address, city, state, ZIP code, and telephone no. Brooklyn Music Publ Grp, Inc. 5455 Wilshire Blvd., Suite 170 Los Angeles CA 90036 (310) 777-6555		1 Rents \$	2 Royalties \$	OMB No. 1545-0115 <b>2007</b> <b>Miscellaneous Income</b> Form 1099-MISC
PAYER'S federal identification number 95-4823572	RECIPIENT'S identification number 20-1003621	3 Other income \$	4 Federal income tax withheld \$	
RECIPIENT'S name Mississippi John Hurt Music (Estate) 200 S. Michigan Ave. Ste 1240 Chicago IL 60604		5 Fishing boat proceeds \$	6 Medical & health care payments \$	
Account number (see instructions) 1		7 Nonemployee compensation \$ 10410.74	8 Substitute payments in lieu of dividends or interest \$	
		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	10 Crop insurance proceeds \$	Copy B For Recipient This is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction may be imposed on you if this income is taxable and the IRS determines that it has not been reported.
		13 Excess golden parachute payments \$	14 Gross proceeds paid to an attorney \$	
		15a Section 409A deferrals	15b Section 409A income	
		16 State tax withheld \$	17 State/Payer's state no. \$	
			18 State income \$	

Form 1099-MISC (keep for your records) Department of the Treasury - Internal Revenue Service

PAYER'S name, street address, city, state, ZIP code, and telephone no. Brooklyn Music Publ Grp, Inc. 5455 Wilshire Blvd., Suite 170 Los Angeles CA 90036 (310) 777-6555		1 Rents \$	2 Royalties \$	OMB No. 1545-0115 <b>2007</b> <b>Miscellaneous Income</b> Form 1099-MISC
PAYER'S federal identification number 95-4823572	RECIPIENT'S identification number 20-1003621	3 Other income \$	4 Federal income tax withheld \$	
RECIPIENT'S name Mississippi John Hurt Music (Estate) 200 S. Michigan Ave. Ste 1240 Chicago IL 60604		5 Fishing boat proceeds \$	6 Medical & health care payments \$	
Account number (see instructions) 1		7 Nonemployee compensation \$ 10410.74	8 Substitute payments in lieu of dividends or interest \$	
		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	10 Crop insurance proceeds \$	Copy 2 To be filed with recipient's state income tax return, when required.
		13 Excess golden parachute payments \$	14 Gross proceeds paid to an attorney \$	
		15a Section 409A deferrals	15b Section 409A income	
		16 State tax withheld \$	17 State/Payer's state no. \$	
			18 State income \$	

Form 1099-MISC Department of the Treasury - Internal Revenue Service

## Instructions for Recipient

**Account number.** May show an account or other unique number the payer assigned to distinguish your account.

**Amounts shown may be subject to self-employment (SE) tax.** If your net income from self-employment is \$400 or more, you must file a return and compute your SE tax on Schedule SE (Form 1040). See Pub. 334, Tax Guide for Small Business, for more information. If no income or social security and Medicare taxes were withheld and you are still receiving these payments, see Form 1040-ES, Estimated Tax for Individuals. Individuals must report as explained for box 7 below. Corporations, fiduciaries, or partnerships report the amounts on the proper line of your tax return.

**Boxes 1 and 2.** Report rents from real estate on Schedule E (Form 1040). If you provided significant services to the tenant, sold real estate as a business, or rented personal property as a business, report on Schedule C or C-EZ (Form 1040). For royalties on timber, coal, and iron ore, see Pub. 544, Sales and Other Dispositions of Assets.

**Box 3.** Generally, report this amount on the "Other income" line of Form 1040 and identify the payment. The amount shown may be payments received as the beneficiary of a deceased employee, prizes, awards, taxable damages, Indian gaming profits, payments made by employers to former employees who are serving in the Armed Forces or the National Guard, or other taxable income. See Pub. 525, Taxable and Nontaxable Income. If it is trade or business income, report this amount on Schedule C, C-EZ, or F (Form 1040).

**Box 4.** Shows backup withholding or withholding on Indian gaming profits. Generally, a payer must backup withhold at a 28% rate if you did not furnish your taxpayer identification number. See Form W-9, Request for Taxpayer Identification Number and Certification, for more information. Report this amount on your income tax return as tax withheld.

**Box 5.** An amount in this box means the fishing boat operator considers you self-employed. Report this amount on Schedule C or C-EZ (Form 1040). See Pub. 334.

**Box 6.** For individuals, report on Schedule C or C-EZ (Form 1040).

**Box 7.** Shows nonemployee compensation. If you are in the trade or business of catching fish, box 7 may show cash you received for the sale of fish. If payments in this box are SE income, report this amount on Schedule C, C-EZ, or F (Form 1040), and complete Schedule SE (Form 1040). You received this form instead of Form W-2 because the payer did not consider you an employee and did not withhold income tax or social security and Medicare taxes. Contact the payer if you believe this form is incorrect or has been issued in error. If you believe you are an employee, call the IRS for information on how to report any social security and Medicare taxes or see Form 8919, Uncollected Social Security and Medicare Taxes on Wages.

**Box 8.** Shows substitute payments in lieu of dividends or tax-exempt interest received by your broker on your behalf as a result of a loan of your securities. Report on the "Other income" line of Form 1040.

**Box 9.** If checked, \$5,000 or more of sales of consumer products was paid to you on a buy-sell, deposit-commission, or other basis. A dollar amount does not have to be shown. Generally, report any income from your sale of these products on Schedule C or C-EZ (Form 1040).

**Box 10.** Report this amount on line 8 of Schedule F (Form 1040).

**Box 13.** Shows your total compensation of excess golden parachute payments subject to a 20% excise tax. See the Form 1040 instructions for where to report.

**Box 14.** Shows gross proceeds paid to an attorney in connection with legal services. Report only the taxable part as income on your return.

**Box 15a.** Shows current year deferrals as a nonemployee under a nonqualified deferred compensation (NQDC) plan that is subject to the requirements of section 409A. Any earnings on current and prior year deferrals are also reported.

**Box 15b.** Shows income as a nonemployee under a NQDC plan that does not meet the requirements of section 409A. This amount is also included in box 7 as nonemployee compensation. Any amount included in box 15a that is currently taxable is also included in this box. This income is also subject to a substantial additional tax to be reported on Form 1040. See "Total Tax" in the Form 1040 instructions.

**Boxes 16-18.** Shows state or local income tax withheld from the payments.

Members # 101 4474 3818

file # 2555413

March 14, 2011

From: Mary F. Hurt-Wright

To: Heirs of John Hurt and Gertrude Conley-Hurt

Re: **W9 Tax Form**

Please be advised that the above form must be completed and returned as no funds/monies of any kind can be disbursed to you for the above named estate as this money will be recorded under my social security number as income to me only. In the past I have disbursed money to you without this form and it has caused me tremendous tax and legal issues!

I currently have money that I would very much like to disburse, but without this form I am unable to do so! Should you fail to return this form to me in a timely manner, I will accept that gesture as acknowledgement that you wish your share to be divided with those that return their form.

I appreciate your speedy response to this request.

Sincere Regards,

Mary F. Hurt-Wright



Member # 1014444 3818  
file # 2555413

2144

**BROOKLYN MUSIC PUBLISHING GROUP INC**

5455 WILSHIRE BLVD, STE 1703  
LOS ANGELES, CA 90036

90-3905/1222  
002

DATE 10/12/07

PAY  
TO THE  
ORDER OF

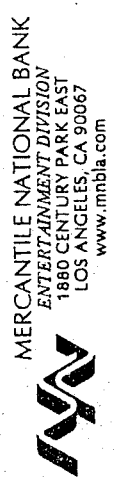
Mississippi John Hurt Music % Mary Hurt

\$2,366.69

two thousand, three hundred & sixty six & 69¢

DOLLARS

Security features  
are included  
on all checks.



*[Signature]*

FOR

⑆002144⑆ ⑆122239050⑆ 0021453789⑆

MP

Members # 1014443818

Yahoo! My Yahoo! Mail

File # 2555413

**YAHOO! MAIL**Welcome, mfhurt\_wright  
[Sign Out, My Account]Search  
the web

Search

Mail Home - Help

Mail Plus

Addresses

Calendar

Notepad

mfhurt\_wright@yahoo.com [Sign Out]

Check Mail

Compose

Search Mail

Mail Upgrades - Mail Options

Folders

[Add - Edit]

[Previous](#) | [Next](#) | [Back to Messages](#)[Printable View](#) - [Full Headers](#)

Inbox (4)

Draft

Sent

Bulk (8)

[Empty]

Trash

[Empty]

Delete

Reply

Forward

Spam

Move...

This message is not flagged. [ [Flag Message](#) - [Mark as Unread](#) ]**Date:** Mon, 8 Nov 2004 15:53:57 -0800 (PST)**From:** "LINDA MENSCH" <menschlaw@yahoo.com> [View Contact Details](#)**Subject:** MS JOHN HURT ESTATE AND BMI ROYALTIES**To:** "mary wright" <mfhurt\_wright@yahoo.com>

Dear Mary:

As you know, we retained AMERICAN LEAGUE MUSIC to administrate the publishing royalties. Basically his job is to seek out existing royalty streams and find the Estate new income.

BMI, the performance rights organization is giving us alot of trouble. We are jumping through hoops to try to obtain what is rightfully yours and your family's. Since there are 2 publishing companies out there with contracts with your Uncle John William, we have to fight hard for this money, or the other companies will get it. BMI is not making it any easier. They insist on having all of the addresses and social security numbers of your grandmother's heirs— even though the money really goes into the estate. This means that we need this information to give to BMI, and your cousins and siblings will have to let us know if they receive any money because chances are they will be underpaid! Or, not paid at all! That is why I want everyone to have AMERICAN LEAGUE MUSIC COLLECT DIRECTLY. This is the only safe way to make sure that the payments are correct.

SO, IF YOU AND YOUR COUSINS AND SIBLINGS WANT TO RECEIVE ANY MONEY FROM THE ESTATE OF MS. JOHN HURT AND FROM THE ESTATE OF GERTRUDE HURT FROM BMI, THEY MUST IMMEDIATELY SEND ME THEIR CURRENT ADDRESS AND SOCIAL SECURITY NUMBER:

Please have them sign the following:

THIS WILL CONFIRM THAT I AM THE GRANDCHILD OF GERTRUDE CONLEY HURT AND MISSISSIPPI JOHN HURT. MY MOTHER WAS IDELLA HURT(OR MY FATHER WAS T.C. HURT). MY CURRENT ADDRESS IS \_\_\_\_\_

MY SOCIAL SECURITY # IS \_\_\_\_\_

THIS CONFIRMS THAT AMERICAN LEAGUE MUSIC IS ADMINISTRATING THE PUBLISHING ON MY BEHALF AND IS RESPONSIBLE FOR COLLECTING AND PAYING ROYALTIES ON MY BEHALF.

VERY TRULY YOURS,



members # 10144443818  
LINDA S. MENSCH, P.C.

ATTORNEY AT LAW\*

File # 2555413  
Date 2/25/09

200 SOUTH MICHIGAN AVENUE  
SUITE 1240  
CHICAGO, ILLINOIS 60604

PHONE: (312) 922-2910  
FAX: (312) 922-1865

OF COUNSEL

MICHAEL G. HEYMAN\*\*  
C. STEPHEN WEAVER\*\*\*

\*LICENSED IN ILLINOIS AND NEW YORK

\*\*LICENSED IN ILLINOIS AND NEW JERSEY

\*\*\*LICENSED IN TENNESSEE AND GEORGIA ONLY

June 18, 1999

To Mary and All:

We have been reviewing the records of the U.S. Copyright Office and have learned the following:

- 1) John William Hurt assigned his publishing rights to Windswept Pacific Music on November 14, 1997.
- 2) Pete Kuykendall of Wynwood Music renewed many of the copyrights in 1983 to 1985.
- 3) Rounder Records is paying Tom Hoskins royalties for sales of the albums released on Rounder Records.
- 4) John William Hurt and his mother Jesse renewed certain copyrights in November of 1997.

We have written letters to Mr. Kuykendall, Mr. Hoskins, and Windswept Records requesting information and demanding an accounting from the royalty recipients.

We need to register the assignment of copyrights to you in the U.S. Copyright Office as soon as possible, preferably before July 1, 1999, when the rates go up to \$50 per copyright from \$20. Since we are looking at registering approximately 96 titles, we will need the filing fees in advance. We may be able to just limit our assignments to the most prominent titles. At the lower rate, you will incur about \$2,000 in filing fees. At the higher rate, it will be \$5,000.

You need to be prepared to go back into Probate Court in Grenada, MS., petitioning the court to conserve the assets of the estate, requiring all of the originally named parties to place such funds in escrow for division among the heirs. The reason for this is that we need to be able to apply pressure to the current royalty recipients so they will properly account the payments to you.

Best regards,

Linda S. Mensch, P.C.

200 S. MICHIGAN AVE.  
SUITE 1240  
CHICAGO, IL 60604

**March 31, 2011**

**Dear Relatives:**

**I just want to give you some background of the Mississippi John Hurt Music, Inc. Next year, November 2012 will be the 46<sup>th</sup> anniversary of Daddy John's death, which means that all of his work will be in public domain or anyone can record or do anything they want with his music without paying royalties to the family. The only thing we can do right now is preserve as much as we can for our family for future generations. Therefore; I developed this company to ensure that we maintain a viable piece of his name for our children that maybe some day want to use their talents in music. This check is a result of a commercial which I pushed under the company's name. I have pursued other avenues as well, but this is the first time any money have come of it.**

**I pray more money is generated through this effort. It has been difficult, but anything worth having is worth working for.**

**I think it is worth mentioning that the record companies which use to send royalties are no longer doing so because for these reasons: they know that the statute will run out and by the time you find a lawyer to fight for it, it will not be worth it. Most importantly, Sterling has worried the living hell out of all of them! Due to this, he has cost the estate much money in legal fees.**

**Should you have additional questions, please feel free to call or email me.**

**Sincere Regards,**

**Mary F. Hurt-Wright**

ESTATE OF GERTRUDE CONLEY HURT  
c/o MARY HURT WRIGHT  
520 MILTON LANE  
HOFFMAN ESTATES, IL 60194

March 19, 2007

TO: THE GRANDCHILDREN AND HEIRS OF MISSISSIPPI JOHN HURT AND  
GERTRUDE CONLEY HURT: Sterling Conley Hurt, Dorothy M. Miller, Jesse L  
Johnson, Annie C. White Ledger, Mary Conley Hurt West, Willie Eddie Conley, R.C.  
Conley's Estate, Bobbie Hurt Lawrence, Henry Hurt Conley, Rebecca Hurt Conley,  
Ulysses Conley, Mary F. Conley Wright, Irene Conley Smith's Estate, T.C. Conley Jr.,  
Lonnie Conley's Estate

FROM: MARY HURT WRIGHT

I am pleased to advise you that we have a royalty distribution from Rounder Records.  
Please note that 1/3 of this amount is due to our attorney, pursuant to the Retainer  
Agreement with our grandmother, us and Linda S. Mensch PC of Sept. 17, 1997. Because  
Ms. Mensch does not want to deal with our family member Sterling, even though we  
agreed to pay her attorney's fees of 33 1/3% of the gross monies received from all  
sources, she has refused to accept any portion of the \$104 share of Sterling's 1/56 share.  
Since Sterling has caused additional administration expenses, I may deduct some of those  
expenses from his share.

The monies will be paid as follows:  
TOTAL RECEIVED;

\$5841.45

To Sterling Conley Hurt 1/56

\$104.31

REMAINING AMT.

\$5737.14

Attorneys fees to LSM PC

\$1912.38

Amount to be distributed

\$3824.76

Mailing expenses for Mary Wright:

no charge

Attorney phone calls, fedex, Copying expenses

no charge

Amount per Grandchild-heir, except Sterling  
Amount to Sterling

\$ 273.19

\$104.31

(INCLUDES THE ESTATE OF RC CONLEY)

Best wishes-

People and Companies currently profiting from my  
grandfather's music

1. Country Joe and The Fish
2. John Hammond
3. Chris Smither
4. Tom Paxton
5. Dave Van Ronk
6. Doc and Merie Watson
7. Anne Reed
8. John Fahey
9. Taj Mahal Bruce
  
10. Bob Dylan
  
11. Jerry Garcia
  
12. John Mcutheon
  
13. Philip Ratcliffe
  
14. Bill Morrison Estate
  
15. Verizon Phone Co.
  
16. Nokia phone Co.

17. Virgin Mobile phone Co.
18. At&t phone Co.
19. Comcast phone Co.
20. Gmac Car company
21. Vonage phone company
22. Boost mobile phone Co.
23. Cellular One phone Co.
24. South Bell phone Co.
25. Cingular Edge phone Co.
26. Metro Pcs phone Co.
27. Nextel phone company
28. South central bell phone co.
29. Rounders record Co.
30. Welks Music group
31. Concord record group

32. Wynwood record Co.
33. BMI record Company
34. Okea record Co.
35. Amizon record Co.
36. Rounders record Co.
37. Herizon record group
38. Sonys record Co.
39. Wind swept pacific music Co.
40. American League Music Co.
41. T-Mobile Phone Co.
42. Stefan grossman

## AutoAdOpolis

THE Place for auto advertising chatter

---

### Chevy Runs Deep

Posted on October 27, 2010 | 1 Comment

Gotta admit I was skeptical when I first heard a few days ago that Chevrolet's new ad tag was "Chevy Runs Deep." What in the world does THAT mean? There were some immediate negative reactions in the online chat rooms that the line was mysterious and would never be as iconic as some of famous ones from Chevrolet's long-time ad agency Campbell-Ewald – "Like a Rock" for trucks and the classic "See the USA in Your Chevrolet." Cynics were saying Chevy was in deep all right.

But I changed my mind after sitting through this morning's press conference in Detroit with GM's US marketing chief Joel Ewanick, Chevy's marketing VP Chris Perry and Jeff Goodby, co-chief of Chevy's new agency Goodby, Silverstein & Partners. Seeing the new work obviously helped put the whole thing in perspective.

The first commercials in the new campaign show off Chevy's 99-year U.S. heritage with a look to current models and the future. (Some footage was shot recently with vintage cameras to give them an old look). There's an obvious attempt to tap into emotions, but it isn't overly sappy. The positioning of Chevy as this country's all-American car brand is done without waving the flag in your face. There IS a bit of chest-beating – like the line "This isn't just any car company. This is Chevy." But thankfully the ads don't do too much of that and the narration of actor-comic Tim Allen helps.

Take a look at the :60 brand anthem commercial that's breaking tonight during the World Series broadcast

**[<http://tinyurl.com/chevyanthem>]**

The three other commercials are all :30s and are part of what Perry called "shared moments" of "those emotional events that kind of connect us as a society." One shows owners posing proudly with their first Chevrolets. Another is of couples bringing their newborns home in their cars, with Mississippi John Hurt's soulful rendition of "You are my Sunshine." The final spot, for Chevy pickups, is a montage of dogs in the trucks, with Hank Williams' "Move it On Over" (his first big hit in 1947).

There's not a lot of narration from Tim Allen in those three commercials and that works fine.

The out-of-home posters are so cool that lots of people are really going to want them. I'll be first in line! There's also digital, print and social media.

It's good to see Chevy making a serious play in the ad game after more than a year of ad agency turmoil and insanity. GM needs Chevrolet to do well. Chevy accounts for 7 out of every 10 new vehicles GM sells, Ewanick said today.

Before you criticize "Chevy Runs Deep" remember what Publicis, and Chevy's old management had planned for an ad tag- "Excellence For All." Ewanick dumped both the agency and the tag and hired Goodby, Silverstein, which now has roughly 100 people working on the account in Detroit. (See my May 26 post "New Era for GM Advertising?")

We weren't a fan of Campbell-Ewald's "American Revolution" campaign that started in 2003, but have reason to believe it was driven by the client. Regular readers know how I felt about Howie Long in Chevy ads and glad to see him gone. (nothing personal, Howie )

"A lot of pressure is put on tag lines," but they're all about context, Jeff Goodby said today. "You have to let these develop."

I know what he means. After Goodby won the Hyundai account in spring 2007 (Ewanick was Hyundai's marketing VP then) the first big blitz the agency did was a shocker- carless car commercials that asked viewers to "Think About It" and visit the web site of the same name.

I wasn't an early fan and neither were Hyundai dealers. But after a short time we all got the message and Hyundai is still using that ad tag today.

Stay tuned.

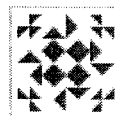
**MAKING TRACKS:** Michael Jackson, hired in January by CODA Automotive as senior vice president of global sales and distribution, has left the electric-car maker.

This entry was posted in [Auto Advertising](#), [THE place for auto advertising chatter](#) and tagged [Campbell-Ewald](#), [Chevrolet](#), [Chevy Runs Deep](#), [Chris Perry](#), [Goodby](#), [Howie Long](#), [Jean Halliday](#), [Jeff Goodby](#), [Joel Ewanick](#), [Publicis](#), [Silverstein](#). Bookmark the [permalink](#).

## ONE RESPONSE TO CHEVY RUNS DEEP

**DER** | [October 27, 2010 at 9:33 pm](#) | [Reply](#)

Oh boy, here we go again with the old tell 'em we're old so they will think we're good. Gag me! So over used and trite.



---

Theme: Coraline by Automattic. Blog at WordPress.com.



GM Legal Dept  
200 Center  
P.O. Box 200  
Detroit, MI 48265

Sterling Conley  
5301 East McKinney  
Lot 348  
Denton, TX 76208  
7/19/2011

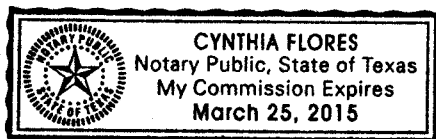
Dear Sir,

My name is Sterling Conley Hurt. I'm an heir to the estate of Mississippi John Hurt. The reason for me writing your company is because you are in violation for using my grandfather song entitled "You are my sunshine". I have not given anyone permission to represent my interest in this matter and if I'm not compensated for your violation, I will sue your company for copyright infringement. Enclosed for your information is important documents from the United States Copyrights Office that explains my position.

Thank You,

Sterling Conley Hurt

*Sterling Conley*



State of Texas  
County of Denton

Sworn to and subscribed before me on  
the 20<sup>th</sup> day of July, 2011

Cynthia Flores  
Notary Public's Signature  
My Commission Expires 3-25-15

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required by the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

## I. (a) PLAINTIFFS

## DEFENDANTS

(b) County of Residence of First Listed Plaintiff Denton County  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Mary Wright Huff  
(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) Attorney Linda S mensch

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

Fraud, Falsifying documents, money laundering

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

## FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE